

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 02-30043-MAP
)
 MICHAEL QUICKEL,)
 Defendant.)

Substantial Assistance Motion

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, moves pursuant to U.S.S.G. § 5K1.1 to authorize the Court to depart from the otherwise applicable sentencing guideline range based on Michael Quickel's substantial assistance to the government in the investigation and prosecution of others.

Nature and Extent of Cooperation

Quickel cooperated almost immediately after he was arrested. He was fully debriefed and agreed to testify against his co-defendants. His cooperation was somewhat instrumental in inducing the guilty pleas of three co-defendants because he would have told the story of obtaining 17 of the firearms, thereby making the government's case more complete.

Ivan Teleguz went to trial and Quickel testified that he purchased 17 of the firearms for Teleguz. Quickel was very cooperative during his trial preparation and sincere in his testimony, which was instrumental in convicting Teleguz.

Quickel took a substantial risk in testifying against Teleguz, who is very dangerous. During his federal trial in December, 2006, Teleguz was awaiting trial in Virginia for the

capital crime of hiring a hit man who brutally murdered Teleguz's former girlfriend. Teleguz did not want to pay child support for the child he had with the girlfriend. After Teleguz's federal trial, he was convicted of the capital crime and the jury has recommended that he be executed.

Recommendation

The government recommends that the Court sentence Quickel to fourteen months in prison, which is a forty per cent downward departure from the low end of the sentencing guideline range.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

by: /s/ Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney

Date: April 25, 2006

Certificate of Service

April 25, 2006

I certify that I caused the foregoing document to be faxed to counsel for the defendant, Richard Maggi, Esq.

/s/ Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney